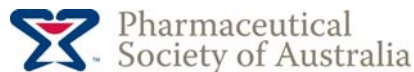


***National Registration and Accreditation Scheme
for the Health Professions***

***Proposed arrangements for information sharing
and privacy***

***Submission by the
Pharmaceutical Society of Australia***

15 December 2008



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The Pharmaceutical Society of Australia (PSA) represents the professional interests of pharmacists across the nation. It provides standards of practice, education, training and practice support for pharmacists and helps members of the profession to deliver quality health care to consumers.

PSA takes this opportunity to provide a submission on the proposed arrangements for information sharing and privacy under the National Registration and Accreditation Scheme for the Health Professions.

PSA's comments are presented in table format with cross referencing to the relevant section of the consultation paper.

Page no.	Proposal / section no.	Comments
8	3.2.1	PSA appreciates the basic intent of this proposal. We note, however, that in the case of pharmacists it is not uncommon to be employed by multiple employers and/or at many locations. This can occur where a pharmacist works as a locum or holds more than one part-time position. Collecting details of the primary employer may be an alternative option but this could mean the basic intent of the proposal is not fulfilled. These circumstances illustrate that it may not always be practical or possible for employer details to be collected and maintained.
8	3.3	PSA believes the proposal around the unique identifier requires further development and possibly separate consultation. At present, it is not clear for example how one would determine what "other information sharing in the public interest" should occur. Further, it is proposed in the paper that "legislation governing the operation of NEHTA and Medicare Australia provide appropriate protection for the information provided to [other] agencies". We request further detail on how this will be achieved.
9	3.4, last paragraph	PSA notes that the possibility of "increased registration fees" is mentioned in relation to additional costs of identity checking. PSA reiterates its concerns from previous submissions that a significant increase in the cost of registration for the profession would not be acceptable given that the Scheme is intended to reduce duplication and increase efficiencies.
11	3.8.5	PSA believes the Australian Institute of Health and Welfare is the appropriate body to be granted responsibility as the authoritative source of the workforce data.
12	4.1.1, bullet point c	It is not clear how details (postcode and name) of contact address can be regarded as "essential information to protect public safety". Presumably this is the registrant's preferred contact address and therefore may not relate to their location of practice.

Page no.	Proposal / section no.	Comments
12	4.1.1, bullet point e	Similarly, how would the practitioner's date of first registration facilitate public safety?
12	4.1.1, bullet point f	Is the renewal date actually required on the public register or would it be adequate and perhaps more appropriate to simply indicate whether or not the practitioner's registration is current?
12	4.2.1	PSA believes option 4 is most appropriate in terms of public accountability and transparency. We do not support the creation of a separate register.
13	4.5.1	The proposal suggests that a copy of the register may be provided if the agency is satisfied that it is in the public interest to do so. Would guidelines be developed on proposed public interest criteria? Also would such a set of criteria be applied by the agency across all professions or would the national board of each profession determine whether or not a request was in the public interest?
15	5.1.1	PSA supports the use of the private sector provisions of the <i>Privacy Act 1988</i> as the basis for the privacy arrangements in the national scheme. Overall we believe these provisions are the most widely understood by the pharmacy profession.

(End of submission)